

July 5, 2013

BY COURIER (2 COPIES) AND EMAIL

Ms. Kirsten Walli

Board Secretary

Ontario Energy Board

P.O. Box 2319

2300 Yonge Street, Suite 2700

Toronto, Ontario M4P 1E4

Fax: (416) 440-7656

BoardSec@ontarioenergyboard.ca

Dear Ms. Walli:

**Re: Environmental Defence Correspondence
EB-2012-0451 – Enbridge Gas Distribution Inc. (“Enbridge”)
GTA Pipeline Leave to Construct; EB-2012-0433, EB-2013-0074
Union Gas Ltd. (“Union”) – Parkway West and Brantford-Kirkwall
Parkway D Projects**

Pursuant to *Procedural Order No. 2*, enclosed please find a set of interrogatories from Environmental Defence to the Green Energy Coalition.

Please also find enclosed two Declaration and Undertaking forms. We ask that Enbridge and the Green Energy Coalition provide an electronic copy of the confidential cost information to kent.elson@klippensteins.ca and cory.wanless@klippensteins.ca.

Please do not hesitate to contact me if anything further is required.

Yours truly,



W. Cory Wanless

cc: Applicant and Intervenors

EB-2012-0451
Enbridge Gas Distribution Inc. (“Enbridge”) – GTA Pipeline Project

EB-2012-0433, EB-2013-0074
Union Gas Ltd. (“Union”) – Parkway West and Brantford-Kirkwall Parkway D Projects

**Environmental Defence Interrogatories
to the Green Energy Coalition (“GEC”)**

Filed: July 5, 2013

Issue A.3 “Are the costs of the facilities and rate impacts to customers appropriate?”

Interrogatory No. A3.GEC.ED.1 Reference: L.EGD.GEC.1 p.20

Please compare and provide the approximate ratio of:

- (i) The avoided costs associated with avoiding each of Segments B1 and B2 and future load growth driven GTA reinforcements; and
- (ii) The avoided costs that Enbridge utilizes for screening DSM?

Please provide an estimate assuming the DSM will be spread throughout the GTA and alternatively assuming that the DSM will be delivered in the zone served by the Don Valley line (if possible).

Interrogatory No. A3.GEC.ED.2 Reference: L.EGD.GEC.1 p.20

Please discuss the rate impact of DSM that would avoid the capital investment listed above compared to the rate impact of proceeding with these projects.